

Blackburn Media Inc.

Accessibility Policies and Accessibility Plan (the “Accessibility Plan”)

General

Introduction

This Accessibility Plan is in compliance with the Accessible Canada Regulations: SOR/2021-241 under the *Accessible Canada Act* (“ACA”).

The Accessible Canada Regulations under the ACA require that Blackburn Media Inc. (“BMI”) establish, implement, maintain and document its accessibility plan (the “Accessibility Plan”). The Accessibility Plan outlines BMI’s strategy for preventing and removing barriers for persons with disabilities and meets our obligations under the Accessible Canada Regulations and the ACA.

The Accessibility Plan will be publicly available, including in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every three years.

Application

The Accessibility Plan applies to all employees, as defined in the Accessible Canada Regulations, as well as the clients of BMI in Canada.

Our Commitment

In fulfilling our mission, BMI strives to treat all individuals in a manner that allows them to maintain their dignity and independence. BMI promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. We will seek to achieve this by preventing and removing barriers to accessibility and by meeting accessibility requirements under the ACA. This Accessibility Plan sets out BMI’s policy on how we will achieve accessibility in all areas of BMI’s operations.

The following accessibility strategies set out the requirements that are applicable to BMI:

1. Employment
2. The Built Environment
3. Information and Communication Technologies
4. Communication, Other than Information and Communication Technologies
5. The Procurement of Goods, Services and Facilities
6. The Design and Delivery of Programs and Services
7. Transportation

Feedback

BMI has a designated accessibility representative. The representative is designated to receive feedback relating to accessibility and accessibility barriers on behalf of BMI.

BMI's **Designated Accessibility Representative** is as follows:

Marian George
Human Resources Administrator

You can provide feedback and/or communicate with BMI and the Designated Accessibility Representative in any of the following manners:

Mail: 700 Richmond St, London, ON N6A 5C7

Telephone: 519-679-8680

E-mail: hr@blackburnmedia.ca

Consultation

As part of developing BMI's Accessibility Plan, BMI engaged in consultations with its employees and accessibility experts. In particular, BMI sought feedback from persons with disabilities regarding its operations in order to identify remove and prevent accessibility barriers.

Consultations occurred with available community accessibility groups to conduct an on-site evaluation of Blackburn branch operations.

In addition to that Blackburn consulted with employees through an on-line accessibility survey to gather feedback on accessibility at the workplace.

During our consultations, the feedback we gathered identified:

- a training plan that has a focus of accessibility including on-going training for employees addressing areas like unconscious bias and workplace accessibility and inclusiveness.
- consult employees with disabilities when developing policies and procedures.
- Work to build a cohesive plan to address accessibility in branches and review on a regular basis.

Areas Described Under Section 5 of the ACA

The following sets out how BMI is committed to complying with the ACA:

1. Employment

BMI is committed to fair and accessible employment practices in all stages of the employment cycle that will respect the dignity and independence of current and prospective team members with disabilities.

Current Level of Accessibility in the Area of Employment:

BMI clearly identifies as an equal opportunity employer and encouraging diversity in the workplace. BMI is committed to providing a fair and equitable work environment and encourages applications from qualified Men, Women, visible minorities, aboriginal peoples and persons with disabilities.

This statement is included and reinforced in all hiring practices at BMI, additionally any applicants should identify if they require accommodation during the recruitment process on a confidential basis. This is published on all job postings, asked during the interview process and posted in our operations.

Accommodation policy in place that is clear and understood by all employees.

Barriers in Employment as Identified by Consultation Participants:

Feedback identified that more overall staff training is essential during the hiring process to ensure a greater emphasis on accessibility needs.

Accessibility Goals in the Area of Employment:

Develop a step-by-step plan to remove any accommodation barriers during the hiring and retention of staff. This will be done a methodical, consultive way respectful of the accommodation needs as they arise. This will be done in the following way;

- Continue to inform all job applicants that there is available accommodation should they request it during the hiring process.
- Through a training and education process, ensure that staff responsible for hiring value a candidate that lives in a designated group in Canada (including persons with disabilities).

Planned Action to Achieve Accessibility Goals:

(a) Recruitment

BMI is committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities.

BMI will do the following:

(i) Recruitment General

BMI will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- specifying that accommodation is available for applicants with disabilities, on BMI's website and on job postings; and

(ii) Recruitment, Assessment and Selection

BMI will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- if a selected applicant requests an accommodation, a consultation with the applicant and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to the disability; and

(iii) Notice to Successful Applicants

When making offers of employment, BMI will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of BMI's policies on accommodating employees with disabilities in offer of employment letters.

Anticipated Compliance Date: December 31st, 2023

b. *Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports*

BMI will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This will include:

- informing current employees and new hires of BMI's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- providing information as soon as practicable after the new employee begins employment, specifically in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- where an employee with a disability so requests it, BMI will provide or arrange for provision of suitable accessible formats and communications supports for:
 - information that is needed in order to perform the employee's job;
 - information that is generally available to employees in the workplace;and
- in meeting the obligations to provide the information that is set out above, BMI will consult with the requesting employee in determining the suitability of an accessible format or communication support.

Anticipated Compliance Date: December 31st, 2023

c. *Documented Individual Accommodation Plans/Return to Work Process*

BMI will incorporate new accessibility requirements under the Accessible Canada Regulations to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

BMI's existing policies and practices include steps that BMI will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability.

BMI will review and assess existing policies to ensure that they include steps that BMI will take to accommodate employees with disabilities and to facilitate employees' return to work after absence due to disability. BMI will also ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities if such plans are required.

BMI will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which BMI can request an evaluation by an outside medical or other expert, at BMI's expense, to assist BMI in determining if and how accommodation can be achieved;
- information regarding the manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial if an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- the following will be included if individual accommodation plans are established:
 - any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
 - information that is needed in order to perform the employee's job;
 - information that is generally available to employees in the workplace; and
- identify any other accommodation that is to be provided to the employee.

BMI will ensure that the return to work process as set out in its existing policies outlines:

- the steps BMI will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

Anticipated Compliance Date: June 1st, 2024

d. Performance Management, Career Development and Redeployment

BMI will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- when using its performance management process in respect of employees with disabilities;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

BMI will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the Accessible Canada Regulations and ACA;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - assessing performance;
 - managing career development and advancement; and
 - redeployment is required.
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Anticipated Compliance Date: June 1st, 2024

2. The Built Environment

BMI is committed to removing barriers in public spaces and buildings that will uphold the dignity and independence of persons with disabilities.

Current Level of Accessibility in the Area of the Built Environment:

All branches currently have procedures in place to accommodate access for the public, clients/customers and employees. This includes trained staff to help ensure anyone can be granted access to the building for the purposes of the visit.

Barriers in the Built Environment as Identified by Consultation Participants:

- Installation of doorbell/intercom/camera at main entrances
- Colour contrast between floors and walls in the building
- Doorknobs replaced with levered handles.
- Sinks should have leaver handles.

Accessibility Goals in the Area of the Built Environment:

Continue to seek feedback from the public, clients/customers, accessibility expert(s) and staff regarding progress of barrier removal.

Ongoing training of BMI staff with emphasis on accessibility for the built environment.

Work to do the remove identified barriers that are not new construction or significant redevelopment in the short term.

Planned Action to Achieve Accessibility Goals:

While BMI has no current plans to engage in new construction or significant redevelopment of its facilities at present, BMI will meet the ACA for all built obligations should any such construction take place in the future.

BMI will put procedures in place to prevent service disruption to its accessible parts of public spaces. In the event of a service disruption, BMI will notify the public of the service disruption and alternatives available.

Anticipated Compliance Date: December 31st, 2024

3. Information and Communication Technologies

BMI is committed to making company information and communications accessible to persons with disabilities.

Current Level of Accessibility in the Area of Information and Communication Technologies:

Blackburn Web Accessibility is not sufficient to ensure that all information and communications technology products, services and digital content are accessible with the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.1.

Procurement, development, and use of information and communications technology hardware and software do not consistently reflect national accessibility requirements.

Currently not all accessibility features are not available on software and hardware. There is no accommodation requests currently open in this area.

Barriers in Information and Communication Technologies as Identified by Consultation Participants:

- Web/Mobile sites are not fully WCAG compatible.
- All accessibility features are often not enabled on software and hardware should a person with disabilities require it.

Accessibility Goals in the Area of Information and Communication Technologies:

Produce an inventory of IT systems to measure accessibility capabilities.

training IT employees to augment knowledge and understand of accessibility requirements to adapt services and interactions accordingly.

ensuring that accessibility is tested through the lifecycle of the use of any new tool introduced (this will help identify areas to train employees on accessible utilization);

training on using accessibility features on all available programs.

progressively introduce and adapt IT systems to new accessibility functionality.

review Web presence with a goal of improving user experience for persons with disabilities.

Engaging persons with disabilities to test accessible compatibility of Web/mobile sites.

Planned Action to Achieve Accessibility Goals:

BMI will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of persons with disabilities.

(a) *Feedback, Accessible Formats and Communication Supports*

BMI will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:
 - provide or arrange for the provision of such accessible formats and communication supports;
 - consult with the person making the request to determine the suitability of the accessible format or communication support;
 - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

Anticipated Compliance Date: June 1st, 2025

(b) *Accessible Websites and Web Content*

BMI will work toward making any Canadian-based websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA. Furthermore, BMI will take reasonable steps to ensure that all new Canadian-based websites controlled by BMI, and web content on those sites, will conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA, except where meeting the requirement is not practicable.

Anticipated Compliance Date: December 31st, 2025

4. Communication, Other than Information and Communication Technologies

BMI is committed to making company information and communications accessible to deaf persons in Canada.

Communication, other than information and communication technologies (“ICT”) includes the use of American Sign Language, Quebec Sign Language and Indigenous sign languages. American Sign Language, Quebec Sign Language and Indigenous sign languages are recognized as the primary languages for communication by deaf persons in Canada.

Current Level of Accessibility in the Area of Communication, Other than ICT:

All communication is supplied through current traditional means including written and verbal. Additional communications formats (may include large print, recorded audio and electronic formats, and Braille) required for persons with disabilities is available upon request through the Human Resources department.

Barriers in Communication, Other than ICT as Identified by Consultation Participants:

- The importance of training for staff and management
- Determining the standards for accessible communication

Accessibility Goals in the Area of Communication, Other than ICT:

- Continue to train and develop staff in the policies and procedures regarding accessibility to ensure all staff are knowledgeable of accessibility requirements.

Planned Action to Achieve Accessibility Goals:

BMI will incorporate new accessibility requirements under the communication, other than ICT standard to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of deaf persons in Canada.

(a) *Feedback, Accessible Formats and Communication Supports*

BMI will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to deaf persons in Canada by providing or arranging

- for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for deaf persons in Canada are requested:
 - provide or arrange for the provision of such accessible formats and communication supports;
 - consult with the person making the request to determine the suitability of the accessible format or communication support;
 - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
 - notify the public about the availability of accessible formats and communication supports.

Anticipated Compliance Date: December 31st, 2025

5. The Procurement of Goods, Services and Facilities

BMI is committed to removing barriers with regard to the procurement of goods, services and facilities that will respect the dignity and independence of persons with disabilities.

Current Level of Accessibility in the Area of the Procurement of Goods, Services and Facilities

BMI enters into agreement with third party suppliers that are established businesses working and thriving in the communities we provide radio service. Currently there is no guidance to ensure that barriers don't occur.

Barriers in the Procurement of Goods, Services and Facilities as Identified by Consultation Participants:

While there has been no feedback that identifies a barrier in this area, BMI recognizes the need to improve our contracting process to ensure that goods and services we obtain do not create accessibility barriers.

Accessibility Goals in the Area of the Procurement of Goods, Services and Facilities:

- Ensure that any contract agreements are aware of BMI's accessibility policies and procedures.
- All employees receive training needed to help BMI procurement accessibility goals.

Planned Action to Achieve Accessibility Goals:

BMI will incorporate accessibility comprehension in the procurement of goods, services and facilities,

Anticipated Compliance Date: December 31st, 2023

6. The Design and Delivery of Programs and Services

BMI is committed to removing barriers in the design and delivery of programs and services that will uphold the dignity and independence of persons with disabilities. We are also committed to giving people with disabilities the same opportunity to get involved with BMI and allowing people with disabilities to benefit from BMI in the same place and in a similar way as other clients.

Current Level of Accessibility in the Area of the Design and Delivery of Programs and Services:

BMI currently has a procedure in place that accommodates clients/customers that identify accommodation is needed. Trained staff is available to help ensure client's/customers are granted access to the services provided by BMI.

Barriers in the Design and Delivery of Programs and Services as Identified by Consultation Participants:

Currently no service barriers have been identified given the nature of the radio service provided, on site, at the clients workplace or through technology.

Accessibility Goals in the Area of the Design and Delivery of Programs and Services:

- Continue to review and seek feedback in this area from all stakeholders.
- Ongoing training of staff to build accessibility awareness when interacting and communicating with persons with disabilities.

Planned Action to Achieve Accessibility Goals:

(a) Communication

When communicating with people with disabilities, we will do so in ways that take into account their disability. Accordingly, we will train our staff who deliver programs and services on how to interact and communicate with people with various types of disabilities.

Anticipated Compliance Date: June 1st, 2024

(b) Assistive Devices

People with disabilities are welcome to use their own personal assistive devices (e.g., white cane, wheelchair, hearing and visual aids) in order to access or use BMI's programs and services. We will train our staff to become familiar with various assistive devices that may be used by volunteers, donors, and clients with disabilities while accessing our services. We will also ensure that staff know how to use assistive devices that are available for clients on our premises.

Anticipated Compliance Date: June 1st, 2024

(c) Service Animals and Support Persons

People with disabilities who are accompanied by a service animal are welcome on all parts of BMI's facilities that are open to the public and other third parties and to participate in BMI's programs. Clients may keep the animal with them unless excluded by law, in which case, we will consider alternative measures to access our services. Our staff and others dealing with the public on our behalf will be trained on how to interact with people with disabilities who are accompanied by a service animal.

Any person with a disability who is accompanied by a support person will be allowed to enter BMI's facilities with their support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to their support person while on our premises or when participating in a BMI program.

Anticipated Compliance Date: June 1st, 2023

Notice of Temporary Disruption

In the event of a planned or unexpected disruption in facilities or services usually used by people with disabilities, BMI will post a notice about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at or near the affected facility or service and/or through other means (e.g., website) where necessary.

Anticipated Compliance Date: June 1st, 2023

Transportation

This section is not applicable to BMI.

Accessible Formats

Accessible formats of this document are available upon request. Requests can made to the Designated Accessibility Representative in any of the following manners:

Mail: 700 Richmond St, London, ON N6A 5C7

Telephone: 519-679-8680

E-mail: hr@blackburnmedia.ca